

From: (b) (6)
Sent: Tuesday, September 06, 2016 2:54 PM
To: HarborComments
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Subject: Portland Harbor "Superfund Site" Comments

The current EPA "plan" appears to expect to approach every element of a very complicated problem at the same time. This will only provide extended opportunities for delay, encouraged by parties at risk from the cost. The agency should consider a revision to break up the plan into multiple parallel projects, in order to permit accelerated mitigation on separate elements. If the Port of Portland can address the complex of questions relating to the Swan Island area, lagoon, riparian zone or upland- then accept the concept of an "operable unit". If the concept of such units is accepted and activated by the EPA, there can progress on parallel units, without every element of the plan being delayed by dependence on every other problem or dispute between interested parties at risk.

The McCormick & Baxter plant site has been frozen for several years. The current EPA process for that plant isolates it from the overall Portland Harbor process, but the site is listed in the plan. This separation only ensures that nothing more will be done but the plant site will continue to weep contaminants into the Willamette River. The EPA should bring the site back into the Harbor process and as of 2016 reconsider the option of cleaning up the site, for potential reuse as riverside industrial property. The success of the Washington Department of Ecology and the Port of Ridgefield in "cleaning up" the Pacific Wood Treating provides a change in facts, that deserves an EPA review and reconsideration, to protect the Willamette River and potentially reduce or remove the continuing expense of isolating the site.

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